

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	<b>CRIMINAL NO. <u>08-</u></b>
<b>v.</b>	<b>:</b>	<b>DATE FILED: <u>November 20, 2008</u></b>
<b>MIGUEL MARTINEZ-FAJARDO,</b>	<b>:</b>	<b>VIOLATIONS:</b>
<b>a/k/a "Carlos Dejesus-Toste,"</b>	<b>:</b>	<b>18 U.S.C. § 922(g)(1) (convicted felon in</b>
<b>a/k/a/ "Angel Sanchez,"</b>	<b>:</b>	<b>possession of a firearm - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. § 922(g)(2) (possession of a</b>
	<b>:</b>	<b>firearm by fugitive from justice - 1 count)</b>
	<b>:</b>	<b>18 U.S.C. §911 (falsely representing to be</b>
	<b>:</b>	<b>United States citizen - 1 count)</b>
		<b>Notice of forfeiture</b>

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about June 27, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**MIGUEL MARTINEZ-FAJARDO,  
a/k/a "Carlos Dejesus-Toste,"  
a/k/a/ "Angel Sanchez,"**

having been convicted in a court of the state of New York of a crime punishable by  
imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate  
commerce a firearm, that is, a Para-Ordinance, P-13-45, .45-caliber semi-automatic handgun,  
serial number RM4228, that was loaded with 12 rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 27, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**MIGUEL MARTINEZ-FAJARDO,  
a/k/a “Carlos Dejesus-Toste,”  
a/k/a/ “Angel Sanchez,”**

while a fugitive from justice, knowingly possessed in and affecting interstate commerce, a  
firearm, that is, a Para-Ordinance, P-13-45, .45-caliber semi-automatic handgun, serial number  
RM4228, that was loaded with 12 rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(2).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about June 27, 2008, in Philadelphia, in the Eastern District of  
Pennsylvania, defendant

**MIGUEL MARTINEZ-FAJARDO,  
a/k/a “Carlos Dejesus-Toste,”  
a/k/a/ “Angel Sanchez,”**

an alien and a citizen and native of the Dominican Republic, falsely and willfully represented  
himself to be a citizen of the United States.

In violation of Title 18, United States Code, Section 911.

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

As a result of the violation of Title 18, United States Code, Sections 922(g)(1) and 922(g)(2), set forth in this indictment, defendant

**MIGUEL MARTINEZ-FAJARDO,  
a/k/a “Carlos Dejesus-Toste,”  
a/k/a/ “Angel Sanchez,”**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of such offense, including, but not limited to:

- (1) a Para-Ordinance, P-13-45, .45-caliber semi-automatic handgun, serial number RM4228;
- (2) the 12 rounds of ammunition removed from the firearm described above.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**LAURIE MAGID**  
**Acting United States Attorney**